

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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In re:	)	Chapter 11
	)	
JOANN INC., <i>et al.</i> <sup>1</sup>	)	Case No. 25-10068 (CTG)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	<b>Re: Docket No. 1317</b>

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**CERTIFICATION OF COUNSEL REGARDING DEBTORS'  
NINTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)  
(Reduced and Reclassified Claims, Reclassified Claims  
Substantive Duplicate Claims, Cross-Debtor Duplicate Claims)**

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The undersigned counsel to the Plan Administrator in the above-captioned cases hereby certifies as follows:

1. On June 30, 2025, the *Debtors' Ninth Omnibus Objection to Certain Claims (Substantive) (Reclassified Claims)* [Docket No. 1317] (the "Objection") was filed with the United States Bankruptcy Court for the District of Delaware (the "Court"). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Objection (the "Proposed Order").

2. Pursuant to the notice of the Objection, the deadline to file a response to the Objection was July 21, 2025 at 4:00 p.m. (prevailing Eastern Time) (the "Response Deadline").

3. Prior to the Response Deadline, the Debtors or Plan Administrator received informal responses to the Objection and Proposed Order from: (i) Nipkow and Kobelt Inc.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

(“Nipkow”); (ii) Colart Americas Inc. (“Colart”); (iii) Enchante Accessories Inc. (“Enchante”); (iv) Elegant Home Ltd. (“Elegant”); (v) Gwen Studios LLC (“Gwen Studios”); (vi) Jones Lang Lasalle Americas, Inc. (“JLL”); and (vii) Caoxian Luyi Guangfa Art and Craft Co., Ltd; and (vii) one individual claimant.

4. Additionally, prior to the Response Deadline, the Plan Administrator received a formal response to the Objection and Proposed Order from Conejo Valley Plaza 2, LLC [Docket No. 1431] (the “Conejo Valley Response”).

5. The Plan Administrator has not received any other informal or formal responses to the Objection and Proposed Order.

6. To resolve Elegant’s informal response,<sup>2</sup> the Plan Administrator and Elegant agreed to a revised Proposed Order, a copy of which is attached hereto as **Exhibit A** (the “Revised Proposed Order”).

7. A redline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

8. The Plan Administrator respectfully requests that the Court enter the Revised Proposed Order at its earliest convenience.

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<sup>2</sup> The unresolved informal responses from Nipkow, Colart, Enchate, Gwen Studios, JLL, and the Conejo Valley Response have been adjourned to the omnibus hearing currently scheduled for September 22, 2025 at 2:00 p.m. (prevailing Eastern Time).

Dated: August 11, 2025  
Wilmington, Delaware

*/s/ Michael E. Fitzpatrick*

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**COLE SCHOTZ P.C.**

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